

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

STEVE KIM, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

U.S. BANCORP and U.S. BANK NATIONAL
ASSOCIATION,

Defendants.

Case No. 2:20-cv-00032-TL-BAT

**STIPULATED MOTION AND
ORDER APPROVING THE
PARTIES' COLLECTIVE ACTION
SETTLEMENT AGREEMENT AND
RELEASE ADDENDUM**

**NOTED FOR CONSIDERATION:
DECEMBER 9, 2022**

Plaintiff Steve Kim and Defendants U.S. Bancorp and U.S. Bank National Association jointly move to this Court to approve the parties' Collective Action Settlement Agreement and Release Addendum.

I. STIPULATION

Pursuant to LCR 7(d)(1), the parties respectfully submit this stipulated motion for approval of the Collective Action Settlement Agreement and Release Addendum. In support of the motion, the parties state as follows:

Plaintiff filed their Unopposed Motion for Approval of Fair Labor Standards Act Settlement, Service Awards and Collective Counsel's Attorneys' Fees and Costs on September 21, 2022. *See* Dkt. No. 147.

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On September 29, 2022, the Court entered an Order approving Plaintiff's Unopposed Motion for Approval of Fair Labor Standards Act Settlement, Service Awards and Collective Counsel's Attorneys' Fees and Costs. *See* Dkt. No. 150.

As the parties were preparing for funding the gross fund the distribution of notice, the settlement administrator requested additional information regarding the treatment of collective members with zero workweeks during the collective period.

The parties discussed payment for these individuals and agreed to a \$50.00 minimum payment for each individual collective member, including collective members with zero (0) workweeks, in exchange for the release pursuant to the Settlement Agreement.

Therefore, the parties seek an Order approving the addendum of the Settlement Agreement regarding the individual settlement payment calculations. The Collective Action Settlement Agreement and Release Addendum are attached hereto as Exhibit 1.

RESPECTFULLY SUBMITTED AND DATED this 9th day of December, 2022.

TERRELL MARSHALL LAW
GROUP PLLC

WINSTON & STRAWN LLP

By: /s/ Toby J. Marshall

Toby J. Marshall, WSBA #32726
Email: tmarshall@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
Telephone: (206) 816-6603

By: /s/ Joan B. Tucker Fife

Joan B. Tucker Fife, *admitted pro hac vice*
Email: jfife@winston.com
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, California 94111
Telephone: (415) 591-1000

Gregg I. Shavitz, *admitted pro hac vice*
Email: gshavitz@shavitzlaw.com
Paolo C. Meireles, *admitted pro hac vice*
Email: pmeireles@shavitzlaw.com
SHAVITZ LAW GROUP, P.A.
951 Yamato Road, Suite 285
Boca Raton, Florida 33431
Telephone: (561) 447-8888

Emilie C. Woodhead, *admitted pro hac vice*
Email: ewoodhead@winston.com
Jason S. Campbell, *admitted pro hac vice*
Email: jscampbell@winston.com
Samuel Freeman, *admitted pro hac vice*
Email: sfreeman@winston.com
WINSTON & STRAWN LLP
333 S. Grand Avenue
Los Angeles, California 90071
Telephone: (213) 615-1700

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Justin M. Swartz, *admitted pro hac vice*
Email: jms@outtengolden.com
Sabine Jean, *admitted pro hac vice*
Email: sjean@outtengolden.com
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 245-1000

Attorneys for Plaintiff

Julie S. Lucht, WSBA #31278
Email: jlucht@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Telephone: (206) 359-3154

Attorneys for Defendants

II. ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated this 9th day of December, 2022.



Tana Lin
United States District Judge

STIPULATED MOTION AND ORDER
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ACTION SETTLEMENT AGREEMENT AND
RELEASE ADDENDUM - 3

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